

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS – EASTERN DIVISION**

MARILYN F. QUIRIN, Special Representative of the Estate of RONALD J. QUIRIN, Deceased, Plaintiff, v. LORILLARD TOBACCO COMPANY, et al., Defendants.	§ § § § § § § § § §	CIVIL ACTION NO. 13-2633
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PLAINTIFF’S PROPOSED VERDICT FORMS

COMES NOW Plaintiff, Marilyn F. Quirin, Special Representative of the Estate of
Ronald J. Quirin, Deceased, and files this Plaintiff’s Proposed Verdict Forms.

Respectfully submitted,
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing document was filed and served on All Counsel of Record on this 25th day of February 2015 via CM/ECF.

/s/Gibbs C. Henderson

Gibbs C. Henderson

B45.03 Instruction on Use Of Verdict Forms— Negligence Only--Single Plaintiff and Multiple Defendants

When you retire to the jury room you will first select a foreperson. He or she will preside during your deliberations. Your verdict must be unanimous. Forms of verdicts are supplied with these instructions. After you have reached your verdict, fill in and sign the appropriate form and return it to the court. Your verdicts must be signed by each of you. You should not write or mark upon this or any of the other instructions given to you by the court:

The parties in this case are:

Plaintiff: Marilyn Quirin

Defendants: Lorillard Tobacco Company and Hollingsworth & Vose Company.

If you find for the plaintiff and against any of the defendants, then you should use Verdict Form A.

If you find for Plaintiff Marilyn Quirin, as Executor of the Estate of Ronald Quirin, and against one or more of the defendants, and if you further find that Plaintiff's injury was proximately caused by a combination of the negligence of a defendant or defendants, then you should use Verdict Form A.

If you find in favor of all defendants, then you should use Verdict Form B.

45.04A Wrongful Death Act--Survival Act--Verdict Form A—No Contributory Fault

We, the jury, find for the Estate of Ronald Quirin, deceased, and against the following defendants:

Defendant Lorillard Tobacco Company Yes _____ No _____

Defendant Hollingsworth & Vose Company Yes _____ No _____

We further find the following:

First: We find that the total amount of damages suffered by the Estate of Ronald Quirin, deceased, is \$_____, itemized as follows:

Loss of money, benefits, goods and services: \$_____

Grief, sorrow and mental suffering of Marilyn Quirin: \$_____

Ronald Quirin's disfigurement: \$_____

Ronald Quirin's physical disability: \$_____

Ronald Quirin's reasonable expenses of necessary medical care, treatment, and services rendered: \$_____

Ronald Quirin's physical pain and suffering as a result of his injuries: \$_____

Ronald Quirin's emotional distress as a result of his injuries: \$_____

Ronald Quirin's loss of a normal life: \$_____

Second: We find that the total amount of damage to be:

PLAINTIFF'S TOTAL DAMAGES \$_____

Foreperson

B45.03.B Verdict Form B--Single Plaintiff and Multiple Defendants

We, the jury, find for all of the defendants and against the plaintiff.

Foreperson